

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

In Re: BP P.L.C. SECURITIES
LITIGATION

§
§ MDL NO. 2185
§ CIVIL ACTION NO. 4:10-md-2185
§

**NOTICE OF SPECIAL APPEARANCE BY
TRANSOCEAN OFFSHORE DEEPWATER DRILLING, INC.**

COMES NOW Transocean Offshore Deepwater Drilling, Inc. ("TODDI") and makes this limited and special appearance pursuant to Federal Rule of Civil Procedure 12(b) and all applicable subparts, including subparts 1–6. By making this limited and special appearance, TODDI is not waiving any of its rights, arguments, or defenses, including but not limited to defenses on the grounds of insufficiency or failure of service, lack of personal jurisdiction, improper venue, and all defenses available under the Limitation of Shipowners' Liability Act, 46 U.S.C. § 30501 *et seq.* This limited and special appearance is made solely in connection with the transferee cases filed by Cody A. Nedved, previously styled as *Nedved, derivatively on behalf of BP P.L.C. v. Hayward et. al.*, and Victor Skomedal, previously styled as *Skomedal, derivatively on behalf of BP P.L.C. v. Hayward et. al.* This special appearance by the undersigned counsel is made for the sole and limited purpose of attending the Court-scheduled status conference on October 12, 2010.

SUTHERLAND ASBILL & BRENNAN, LLP

By: /s/ Daniel Johnson

Daniel Johnson

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**COUNSEL FOR TRANSOCEAN OFFSHORE
DEEPWATER DRILLING, INC.**

CERTIFICATE OF SERVICE

I certify that this pleading was filed electronically with the Court, and thus served simultaneously upon all counsel of record, this 11th day of October, 2010.

/s/ Daniel Johnson
Daniel Johnson